

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|--|---|------------------------|
| JERRY HILL, |) | |
| |) | |
| Plaintiff, |) | Case No. 08 C 3300 |
| |) | Judge Hart |
| v. |) | |
| |) | Magistrate Judge Brown |
| |) | |
| CHICAGO POLICE OFFICERS DANIEL |) | |
| RESCHKE, STAR NO. 17201, JOSE |) | |
| ROMERO, STAR NO. 12304, |) | |
| THANASENARIS, STAR No. 6124, and |) | |
| DETRICK, STAR No. 3382, Individually |) | |
| and as employees/agents of the CITY of |) | |
| CHICAGO, a municipal corporation, |) | |
| |) | |
| Defendants. |) | |

**DEFENDANTS' JOINT AGREED MOTION FOR AN EXTENSION OF
TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant City of Chicago (the "City"), by its attorney, Mara S. Georges, Corporation Counsel for the City of Chicago, and Defendants Daniel Reschke, Ted Thanasenaris, and Lawrence Dietrich ("Defendant Officers"), by their attorney, Thomas H. Freitag, Assistant Corporation Counsel, move for an extension of time up to and including September 15, 2008, to answer or otherwise plead to plaintiff's Complaint. In support of this motion, the defendants state as follows:

1. On June 9, 2008, plaintiff filed the current action, alleging state law and constitutional violations against the defendants in the United States District Court, Northern District of Illinois.
2. Plaintiff's complaint and summons were served on the City on July 1, 2008 and Dietrich was served on 5 Aug 08, Reschke was served on 30 July 08, and Thanasenaris was served on 29 July 08.
3. Undersigned counsel was assigned this matter on July 28, 2008.
4. Counsel for the Defendants has just begun the process of investigating the allegations in plaintiff's Complaint, and requires more time to properly answer or otherwise

plead to plaintiff's Complaint.

5. Therefore, counsel for the Defendants requests an extension of time to September 15, 2008, to answer or otherwise plead to plaintiff's Complaint.

6. Counsel for the Defendants spoke to plaintiff's counsel, Mr. Jeffrey Neslund on August 18, 2008, by telephone, and plaintiff's counsel has no objection to this motion.

7. This motion is the defendants' first request for an extension of time to answer or otherwise plead. This request is not made for the purpose of delay or for any other improper purpose.

WHEREFORE, the Defendants respectfully requests that this Court grant them an extension of time up to and including September 15, 2008, to answer or otherwise plead to plaintiff's complaint.

Respectfully submitted,

MARA S. GEORGES
CORPORATION COUNSEL

Defendants Daniel Reschke,
Ted Thanasenaris, and Lawrence Dietrich

/s/ Thomas H. Freitag
THOMAS H. FREITAG
Assistant Corporation Counsel

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CERTIFICATE OF SERVICE

I hereby certify that I have caused true and correct copies of the above and foregoing Agreed Motion and Notice of Motion to be served upon all parties of record pursuant to ECF, in accordance with the rules of electronic filing of documents, on this 18th day of August, 2008.

/s/ Thomas H. Freitag
THOMAS H. FREITAG